

BLANK ROME LLP
Attorneys for Defendant
COSCO BEIJING INTERNATIONAL
FREIGHT CO., LTD.
LeRoy Lambert (LL-3519)
The Chrysler Building
405 Lexington Avenue
New York, NY 10174-0208
(212) 885-5000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MED-ASIA SHIPPING LTD.,

Plaintiff,

-against-

COSCO BEIJING INTERNATIONAL
FREIGHT CO., LTD.,

Defendant.

07 Civ. 9624 (RMB)

**REPLY AFFIDAVIT
OF LEROY LAMBERT
IN SUPPORT OF
MOTION FOR
COUNTERSECURITY/
SECURITY FOR COSTS**

STATE OF NEW YORK)
)
COUNTY OF NEW YORK) ss:

LEROY LAMBERT, being duly sworn, deposes and says:

1. I am a member of the Bar of this State and Court and a partner in the law firm of Blank Rome LLP, attorneys for Defendant/Counterclaimant COSCO BEIJING INTERNATIONAL FREIGHT CO., LTD.

2. Further to ¶ 8 of my Affidavit of February 7, 2008 in support of this motion, I am advised that the relevant financial authority has approved the transfer of \$315,094.65 into our firm's escrow account in accordance with Exhibit 6 to my Affidavit of February 7, 2008. I am

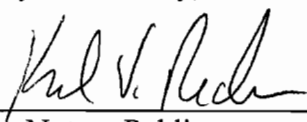
further advised that Med-Asia will allow this transfer to pass into our account and hereby undertake to agree promptly on the terms of an escrow agreement to which Med-Asia is a party if Med-Asia so requests, subject always to further order of the Court.

3. I am further advised that Plaintiff has not yet commenced arbitration in Hong Kong.



LeRoy Lambert (LL-3519)

Sworn to before me this
19th day of February, 2008



Notary Public

KARL V. REDA
Notary Public, State of New York
No. 30-4783126, Qual. in Nassau Cty.
Certificate Filed in New York County
Commission Expires *Nov-30, 2009*